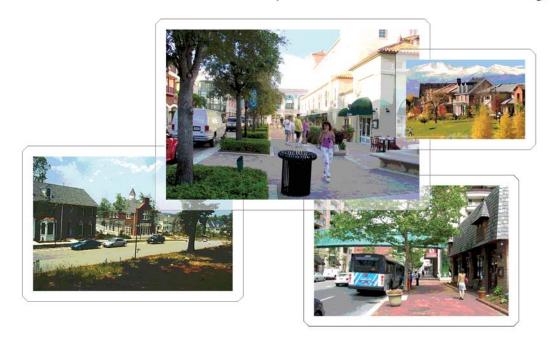
# **Growing Cooler:**

# Evidence on Urban Development and Climate Change



Reid Ewing, Keith Bartholomew, Steve Winkelman, Jerry Walters and Don Chen

with Barbara McCann and David Goldberg









## **About ULI**

The mission of the Urban Land Institute is to provide leadership in the responsible use of land and in creating and sustaining thriving communities worldwide. ULI is committed to

- Bringing together leaders from across the fields of real estate and land use policy to exchange best practices and serve community needs;
- Fostering collaboration within and beyond ULI's membership through mentoring, dialogue, and problem solving;
- Exploring issues of urbanization, conservation, regeneration, land use, capital formation, and sustainable development;
- Advancing land use policies and design practices that respect the uniqueness of both built and natural environments;
- Sharing knowledge through education, applied research, publishing, and electronic media; and
- Sustaining a diverse global network of local practice and advisory efforts that address current and future challenges.

Established in 1936, the Institute today has some 38,000 members in over 90 countries, representing the entire spectrum of the land use and development disciplines. ULI relies heavily on the experience of its members. It is through member involvement and information resources that ULI has been able to set standards of excellence in development practice. The Institute has long been recognized as one of the world's most respected and widely quoted sources of objective information on urban planning, growth, and development.

### **About the Authors**

**Reid Ewing** is a research professor at the National Center for Smart Growth, University of Maryland; an associate editor of the Journal of the American Planning Association; a columnist for Planning magazine; and a fellow of the Urban Land Institute. Earlier in his career, he served two terms in the Arizona legislature, analyzed urban policy issues at the Congressional Budget Office, and lived and worked in Ghana and Iran.

**Keith Bartholomew** is an assistant professor of urban planning in the University of Utah's College of Architecture + Planning. An environmental lawyer, he worked for ten years as the staff attorney for 1000 Friends of Oregon, where he directed "Making the Land Use, Transportation, Air Quality Connection" (LUTRAQ), a nationally recognized research program examining the interactive effects of community development and travel behavior.

**Steve Winkelman** is director of the Transportation Program at the Center for Clean Air Policy (CCAP). He coordinated transportation analyses of climate change plans for New York and several other states, culminating in the CCAP Transportation Emissions Guidebook, which quantifies savings from 40 transportation policies. In February 2007 Steve launched a national discussion, "Linking Green-TEA and Climate Policy," to craft policy solutions that address travel demand.

**Jerry Walters** is a principal and chief technical officer with Fehr & Peers Associates, a California-based transportation planning and engineering firm. He directs integrated land use/transportation research and planning for public entities and real estate development interests throughout the United States and abroad.

**Don Chen** is the founder and executive director of Smart Growth America (SGA) and has worked for the Surface Transportation Policy Project, the World Resources Institute, and the Rocky Mountain Institute. He has been featured in numerous news programs and publications; has lectured in North America, Europe, Australia, and Asia; and has written for many magazines and journals, including "The Science of Smart Growth" for Scientific American.

# **Executive Summary**

The phrase "you can't get there from here" has a new application. For climate stabilization, a commonly accepted target would require the United States to cut its carbon dioxide (CO<sub>2</sub>) emissions by 60 to 80 percent as of 2050, relative to 1990 levels. Carbon dioxide levels have been increasing rapidly since 1990, and so would have to level off and decline even more rapidly to reach this target level by 2050. This publication demonstrates that the U.S. transportation sector cannot do its fair share to meet this target through vehicle and fuel technology alone. We have to find a way to sharply reduce the growth in vehicle miles driven across the nation's sprawling urban areas, reversing trends that go back decades.

This publication is based on an exhaustive review of existing research on the relationship between urban development, travel, and the CO<sub>2</sub> emitted by motor vehicles. It provides evidence on and insights into how much transportation-related CO<sub>2</sub> savings can be expected with compact development, how compact development is likely to be received by consumers, and what policy changes will make compact development possible. Several related issues are not fully examined in this publication. These include the energy savings from more efficient building types, the value of preserved forests as carbon sinks, and the effectiveness of pricing strategies—such as tolls, parking charges, and mileage-based fees—when used in conjunction with compact development and expanded transportation alternatives.

The term "compact development" does not imply high-rise or even uniformly high density, but rather higher average "blended" densities. Compact development also features a mix of land uses, development of strong population and employment centers, interconnection of streets, and the design of structures and spaces at a human scale.

### The Basics

Scientific consensus now exists that greenhouse gas accumulations due to human activities are contributing to global warming with potentially catastrophic consequences (IPCC 2007). International and domestic climate policy discussions have gravitated toward the goal of limiting the temperature increase to 2°C to 3°C by cutting greenhouse gas emissions by 60 to 80 percent below 1990 levels by the year 2050. The primary greenhouse gas is carbon dioxide, and every gallon of gasoline burned produces about 20 pounds of CO2 emissions.

# Driving Up CO, Emissions

The United States is the largest emitter worldwide of the greenhouses gases that cause global warming. Transportation accounts for a full third of CO<sub>2</sub> emissions in the United States, and that share is growing as others shrink in comparison, rising from 31 percent in 1990 to 33 percent today It is hard to envision a "solution" to the global warming crisis that does not involve slowing the growth of transportation CO<sub>2</sub> emissions in the United States.

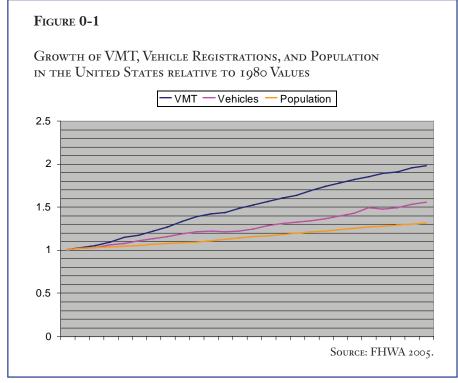
### The Three-Legged Stool Needed to Reduce CO<sub>2</sub> from Automobiles

Transportation CO<sub>2</sub> reduction can be viewed as a three-legged stool, with one leg related to vehicle fuel efficiency, a second to the carbon content of the fuel itself, and a third to the amount of driving or vehicle miles traveled (VMT). Energy and climate policy initiatives at the federal and state levels have pinned their hopes almost exclusively on shoring up the first two legs of the stool, through the development of more efficient vehicles (such as hybrid cars) and lower-carbon fuels (such as biodiesel fuel). Yet a stool cannot stand on only two legs.

As the research compiled in this publication makes clear, technological improvement in vehicles and fuels are likely to be offset by continuing, robust growth in VMT. Since 1980, the number of miles Americans drive has grown three times faster than the U.S. population, and almost twice as fast as vehicle registrations (see Figure 0-1). Average automobile commute times in metropolitan areas have risen steadily over the decades, and many Americans now spend more time commuting than they do vacationing.

This raises some questions, which this report addresses. Why do we drive so much? Why is the total distance we drive growing so rapidly? And what can be done to alter this trend in a manner that is effective, fair, and economically acceptable?

The growth in driving is due in large part to urban development, or what some refer to as the built environment. Americans drive so much because we have given ourselves little alternative. For 60 years, we have built homes ever farther from workplaces, created schools that are inaccessible except by motor vehicle, and isolated other destinations—such as shopping—from work and home. From World War II until very recently, nearly all new development has been planned and built on the assumption that people will use cars virtually every time they travel. As a larger and larger share of our built environment has become automobile dependent,



car trips and distances have increased, and walking and public transit use have declined. Population growth has been responsible for only a quarter of the increase in vehicle miles driven over the last couple of decades. A larger share of the increase can be traced to the effects of a changing urban environment, namely to longer trips and people driving alone.

As with driving, land is being consumed for development at a rate almost three times faster than population growth. This expansive development has caused CO<sub>2</sub> emissions from cars to rise even as it has reduced the amount of forest land available to absorb CO<sub>2</sub>.

#### How Growth in Driving Cancels Out Improved Vehicle Fuel Economy

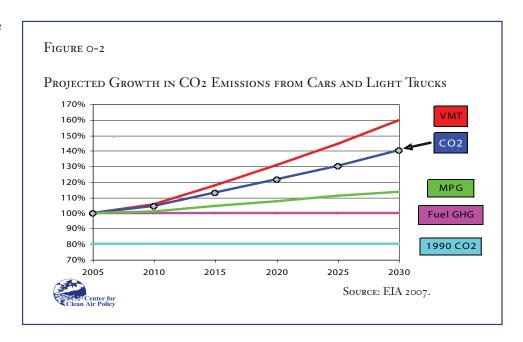
Carbon dioxide is more difficult to control through vehicle technology than are conventional air pollutants. Conventional pollutants can be reduced in automobile exhaust with sophisticated emission control systems (catalytic converters, on-board computers, and oxygen sensors). Carbon dioxide, meanwhile, is a direct outcome of burning fossil fuels; there is no practical way to remove or capture it from moving vehicles. At this point in time, the only way to reduce  $\mathrm{CO}_2$  emissions from vehicles is to burn less gasoline and diesel fuel.

An analysis by Steve Winkelman of the Center for Clean Air Policy, one of the coauthors of this publication,

finds that CO<sub>2</sub> emissions will continue to rise, despite technological advances, as the growth in driving overwhelms planned improvements in vehicle efficiency and fuel carbon content. The U.S. Department of Energy's Energy Information Administration (EIA) forecasts that driving will increase 59 percent between 2005 and 2030 (red line,

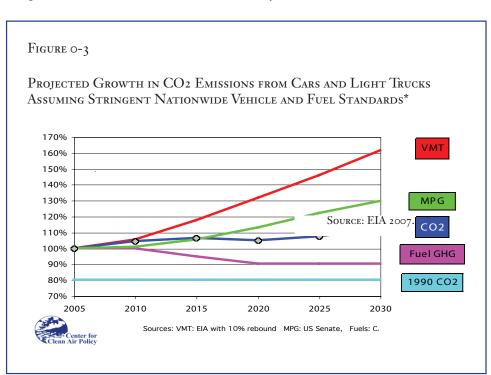
Figure 0-2), outpacing the projected 23 percent increase in population. The EIA also forecasts a fleetwide fuel economy improvement of 12 percent within this time frame, primarily as a result of new federal fuel economy standards for light trucks (green line, Figure 0-2). Despite this improvement in efficiency, CO<sub>2</sub> emissions would grow by 41 percent (dark blue line, Figure 0-2).

U.S. fuel economy has been flat for almost 15 years, as the upward spiral of car weight and power has offset



the more efficient technology. Federal and state efforts are underway to considerably boost vehicle efficiency and reduce greenhouse gas emissions. In June 2007, the U.S. Senate passed corporate average fuel economy (CAFE) standards that would increase new passenger vehicle fuel economy from the current 25 miles per gallon (mpg) to 35 mpg by 2020. (As of this writing, the House has not acted.). California plans to implement a low carbon standard for transportation fuels, specifically a 10 percent reduction in fuel carbon content by 2020.

Even if these more stringent standards for vehicles and fuels were to go into effect nationwide, transportation-related emissions would still far exceed target levels for stabilizing the global climate (see Figure 0-3). The rapid increase in driving would overwhelm both the increase in vehicle fuel economy (green line) and the lower carbon fuel content (purple line). In 2030, CO, emissions would be 12 percent above the 2005 level, and 40 percent above the 1990 level



(turquoise line). For climate stabilization, the United States must bring the CO<sub>2</sub> level to 15 to 30 percent below 1990 levels by 2020 to keep in play a CO<sub>2</sub> reduction of 60 to 80 percent by 2050.

As the projections show, the United States cannot achieve such large reductions in transportation-related  $CO_2$  emissions without sharply reducing the growth in miles driven.

## **Changing Development Patterns to Slow Global Warming**

Recognizing the unsustainable growth in driving, the American Association of State Highway and Transportation Officials (AASHTO), representing state departments of transportation, is urging that the growth of vehicle miles driven be cut in half. How does a growing country—one with 300 million residents and another 100 million on the way by mid-century—slow the growth of vehicle miles driven? Aggressive measures certainly are available, including

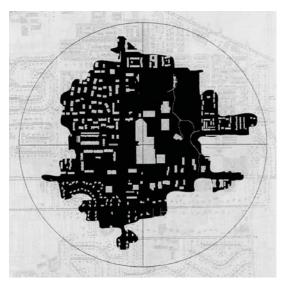
imposing ever stiffer fees and taxes on driving and parking or establishing no-drive zones or days. Some countries are experimenting with such measures. However, many in this country would view such steps as punitive, given the reality that most Americans do not have a viable alternative to driving. The body of research surveyed here shows that much of the rise in vehicle emissions can be curbed simply by growing in a way that will make it easier for Americans to drive less. In fact, the weight of the evidence shows that, with more compact development, people drive 20 to 40 percent less, at minimal or reduced cost, while reaping other fiscal and health benefits.

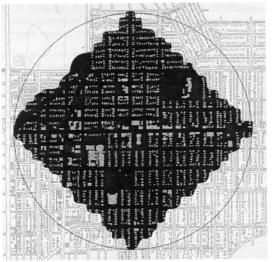
# How Compact Development Helps Reduce the Need to Drive

Better community planning and more compact development help people live within walking or bicycling distance of some of the destinations they need to get to every day—work, shops, schools, and parks, as well as transit stops. If they choose to use a car, trips are short. Rather than building single-use subdivisions or office parks, communities can plan mixed-use developments that put housing within reach of these other destinations. The street network can be designed to interconnect, rather than end in culs-de-sac and funnel traffic onto overused arterial roads. Individual streets can be designed to be "complete," with safe and convenient places to walk, bicycle, and wait for the bus. Finally, by building more homes as condominiums, townhouses, or detached houses on smaller lots, and by building offices, stores and other destinations "up" rather than "out," communities can shorten distances between destinations. This makes neighborhood stores more economically viable, allows more frequent and convenient transit service, and helps shorten car trips.

#### Figure 0-4

DESTINATIONS WITHIN ONE-QUARTER MILE OF CENTER FOR CONTRASTING STREET NETWORKS IN SEATTLE





Source: Moudon et al. 1997

This type of development has seen a resurgence in recent years, and goes by many names, including "walkable communities," "new urbanist neighborhoods," and "transit-oriented developments" (TODs). "Infill" and "brownfield" developments put unused lots in urban areas to new uses, taking advantage of existing nearby destinations and infrastructure. Some "lifestyle centers" are now replacing single-use shopping malls with open-air shopping on connected streets with housing and office space as part of the new development. And many communities have rediscovered and revitalized their traditional town centers and downtowns, often adding more housing to the mix. These varied development types are collectively referred to in this publication as "compact development" or "smart growth."

### How We Know that Compact Development Will Make a Difference: The Evidence

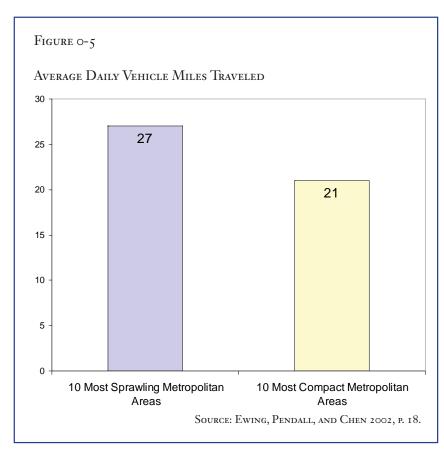
As these forms of development have become more common, planning researchers and practitioners have documented that residents of compact, mixed-use, transit-served communities do less driving. Studies have looked at the issue from varying angles, including:

- research that compares overall travel patterns among regions and neighborhoods of varying compactness and auto orientation;
- studies that follow the travel behavior of individual households in various settings; and
- models that simulate and compare the effects on travel of different future development scenarios at the regional and project levels.

Regardless of the approach, researchers have found significant potential for compact development to reduce the miles that residents drive.

A comprehensive sprawl index developed by coauthor Reid Ewing of the National Center for Smart Growth at the University of Maryland ranked 83 of the largest metropolitan areas in the United States by their degree of sprawl, measuring density, mix of land uses, strength of activity centers, and connectedness of the street network (Ewing, Pendall, and Chen 2002, 2003). Even accounting for income and other socioeconomic differences, residents drove far less in the more compact regions. In highly sprawling Atlanta, vehicles racked up 34 miles each day for every person living in the region. Toward the other end of the scale, in Portland, Oregon, vehicles were driven fewer than 24 miles per person, per day.

This relationship holds up in studies that focus on the travel habits of individual households while measuring the environment surrounding their



homes and/or workplaces. The link between urban development patterns and individual or household travel has become the most heavily researched subject in urban planning, with more than 100 rigorous empirical studies completed. These studies have been able to control for factors such as socioeconomic status, and can account for the fact that higher-income households tend to make more and longer trips than lower-income families.

One of the most comprehensive studies, conducted in King County, Washington, by Larry Frank of the University of British Columbia, found that residents of the most walkable neighborhoods drive 26 percent fewer miles per day than those living in the most sprawling areas. A meta-analysis of many of these types of studies finds that households living in developments with twice the density, diversity of uses, accessible destinations, and interconnected streets when compared to low-density sprawl drive about 33 percent less.

Many studies have been conducted by or in partnership with public health researchers interested in how the built environment can be better designed to encourage daily physical activity. These studies show that residents of communities designed to be walkable both drive fewer miles and also take more trips by foot and bicycle, which improves individual health. A recent literature review found that 17 of 20 studies, all dating from 2002 or later, have established statistically significant relationships between some aspect of the built environment and the risk of obesity.

Two other types of studies also find relationships between development patterns and driving: simulations that project the effect of various growth options for entire regions and simulations that predict the impact of individual development projects when sited and designed in different ways. In regional growth simulations, planners compare the effect of a metropolitan-wide business-as-usual scenario with more compact growth options. Coauthor Keith Bartholomew of the University of Utah analyzed 23 of these studies and found that compact scenarios averaged 8 percent fewer total miles driven than business-as-usual ones, with a maximum reduction of 31.7 percent (Bartholomew 2005, 2007). The better-performing scenarios were those with higher degrees of land use mixing, infill development, and population density, as well as a larger amount of expected growth. The travel models used in these studies would be expected to underestimate the impacts of site design, since most only crudely account for travel within neighborhoods and disregard walk and bike trips entirely.

Of the project-level studies, one of the best known evaluated the impact of building a very dense, mixed-use development at an abandoned steel mill site in the heart of Atlanta versus spreading the equivalent amount of commercial space and number of housing units in the prevailing patterns at three suburban locations. Analysis using transportation models enhanced by coauthor Jerry Walters of Fehr & Peers Associates (Walters, Ewing, and Allen 2000), and supplemented by the EPA's Smart Growth Index (to capture the effects of site design) found that the infill location would generate about 35 percent less driving and emissions than the comparison sites. The results were so compelling that the development was deemed a transportation control measure by the federal government for the purpose of helping to improve the region's air quality. The Atlantic Station project has become a highly successful reuse of central city industrial land.

#### What Smart Growth Would Look Like

How would this new focus on compact development change U.S. communities? Many more developments would look like the transit-oriented developments and new urbanist neighborhoods already going up in almost every city in the country, and these developments would start filling in vacant

lots or failing strip shopping centers, or would revitalize older town centers, rather than replacing forests or farmland. Most developments would no longer be single-use subdivisions or office parks, but would mix shops, schools, and offices together with homes. They might feature ground-floor stores and offices with living space above, or townhomes within walking distance of a retail center. Most developments would be built to connect seamlessly with the external street network.

The density increases required to achieve the changes



JACOBY DEVELOPMENT COMPANY

Atlantic Station today.

proposed in this publication would be moderate. Nelson's work shows that the average density of residential development in U.S. urban areas was about 7.6 units per acre in 2003. His predictions of shifting market demand indicate that all housing growth to 2025 could be accommodated by building condominiums, apartments, townhomes, and detached houses on small lots, while maintaining the current stock of houses on large lots. Under this scenario, while new developments would average a density of 13 units per acre, the average density of metropolitan areas overall would rise modestly, to about nine units per acre. Much of the change would result from stopping the sprawling development that has resulted in falling densities in many metropolitan areas.

Several publications provide a glimpse of what this future might look like. Images of compact development are available in This is Smart Growth (Smart Growth Network 2006) and Visualizing Density (Lincoln Institute of Land Policy 2007).

### The Potential of Smart Growth

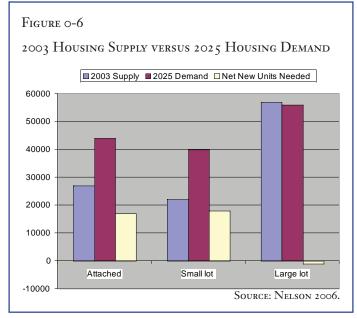
The potential of smart growth to curb the rise in greenhouse gas emissions will, of course, be limited by the amount of new development and redevelopment that takes place over the next few decades, and by the share of it that is compact in nature. There seems to be little question that a great deal of new building will take place as the U.S. population grows toward 400 million. According to the best available analysis, by Chris Nelson of Virginia Tech, 89 million new or replaced homes—and 190 billion square feet of new offices, institutions, stores, and other nonresidential buildings—will be constructed through 2050. If that is so, two-thirds of the development on the ground in 2050 will be built between now and then. Pursuing smart growth is a low-cost climate change strategy, because it involves shifting investments that have to be made anyway.

### Smart Growth Meets Growing Market Demand for Choice

There is no doubt that moving away from a fossil fuel-based economy will require many difficult changes. Fortunately, smart growth is a change that many Americans will embrace. Evidence abounds that Americans are demanding more choices in where and how they live—and that changing demographics will accelerate that demand.

While prevailing zoning and development practices typically make sprawling development easier to build, developers who make the effort to create compact communities are encountering a responsive public. In 2003, for the first time in the country's history, the sales prices per square foot for attached housing—that is, condominiums and townhouses—was

higher than that of detached housing units. The real estate analysis firm Robert Charles Lesser & Co. has conducted a dozen consumer preference surveys in suburban and urban locations1 for a variety of builders to help them develop new projects. The surveys have found that in every location examined, about onethird of respondents prefer smart growth housing products and communities. Other studies by the National Association of Homebuilders, the National Association of Realtors, the Fannie Mae Foundation, high-production builders, and other researchers have corroborated these results—some estimating even greater demand for smart growth housing products. When smart growth also offers shorter commutes, it appeals to another one-quarter of the market, because many people are willing to trade lot or house size for shorter commutes.



Because the demand is greater than the current supply, the price-per-square foot values of houses in mixed-use neighborhoods show price premiums ranging from 40 to 100 percent, compared to houses in nearby single-use subdivisions, according to a study by Chris Leinberger of the Brookings Institution.

This market demand is only expected to grow over the next several decades, as the share of households with children shrinks and those made up of older Americans grows with the retiring of baby boomers. Households without children will account for close to 90 percent of new housing demand, and single-person households will account for a one-third. Nelson projects that the demand for attached and small-lot housing will exceed the current supply by 35 million units (71 percent), while the demand for large-lot housing will actually be less than the current supply.

<sup>&</sup>lt;sup>1</sup> These locations include Albuquerque, Atlanta, Boise, Charlotte, Chattanooga, Denver, Orlando, Phoenix, Provo, Savannah, and Tampa.

# Total Estimated VMT Reduction and Total Climate Impact

When viewed in total, the evidence on land use and driving shows that compact development will reduce the need to drive between 20 and 40 percent, as compared with development on the outer suburban edge with isolated homes, workplaces, and other destinations. It is realistic to assume a 30 percent cut in VMT with compact development.

Making reasonable assumptions about growth rates, the market share of compact development, and the relationship between CO<sub>2</sub> reduction and VMT reduction, smart growth could, by itself, reduce total transportation-related CO<sub>2</sub> emissions from current trends by 7 to 10 percent as of 2050. This reduction is achievable with land-use changes alone. It does not include additional reductions from complementary measures, such as higher fuel prices and carbon taxes, peak-period road tolls, pay-as-you drive insurance, paid parking, and other policies designed to make drivers pay more of the full social costs of auto use.

This estimate also does not include the energy saved in buildings with compact development, or the  $\rm CO_2$ -absorbing capacity of forests preserved by compact development. Whatever the total savings, it is important to remember that land use changes provide a permanent climate benefit that would compound over time. The second 50 years of smart growth would build on the base reduction from the first 50 years, and so on into the future. More immediate strategies, such as gas tax increases, do not have this degree of permanence.

The authors calculate that shifting 60 percent of new growth to compact patterns would save 85 million metric tons of CO<sub>2</sub> annually by 2030. The savings over that period equate to a 28 percent increase in federal vehicle efficiency standards by 2020 (to 32 mpg), comparable to proposals now being debated in Congress. It would be as if the fleetwide efficiency for new vehicles had risen to 32 mpg by 2020. Every resident of a compact neighborhood would provide the environmental benefit expected from, say, driving one of today's efficient hybrid cars. That effect would be compounded, of course, if that person also drove such an efficient car whenever he or she chose to make a vehicle trip. Smart growth would become an important "third leg" in the transportation sector's fight against global warming, along with more efficient vehicles and lower-carbon fuels.

# A Climate-Sparing Strategy with Multiple Payoffs

Addressing climate change through smart growth is an attractive strategy because, in addition to being in line with market demand, compact development provides many other benefits and will cost the economy little or nothing. Research has documented that compact development helps preserve farmland and open space, protect water quality, and improve health by providing more opportunities for physical activity.

Studies also have confirmed that compact development saves taxpayers money, particularly by reducing the costs of infrastructure such as roads and water and sewer lines. For example, the Envision Utah scenario planning process resulted in the selection of a compact growth plan that will <u>save</u> the region about <u>\$4.5</u> billion in infrastructure spending over a continuation of sprawling development.

Finally, unlike <u>hydrogen</u>-fueled <u>vehicles and cellulosic</u> ethanol, which <u>get a lot of</u> attention in the climate-change debate, the "technology" of compact, walkable communities exists today, as it has in one form or another for thousands of years. We can begin using this technology in the service of a cooler planet right now.

## **Policy Implications**

In most metropolitan areas, compact development faces an uneven playing field. Local land development codes encourage auto-oriented development. Public spending supports development at the **metropolitan** fringe more than in already developed areas. Transportation policies remain focused on accommodating the automobile rather than alternatives.

The key to substantial GHG reductions is to get all policies, funding, incentives, practices, rules, codes, and regulations pointing in the same direction to create the right conditions for smart growth. Innovative policies often are in direct conflict with the conventional paradigm that produces automobile dependence.

Here, we three major policy initiatives at the federal level that would benefit states, metro regions, cities and towns in their efforts to meet the growing demand for compact development. These initiatives, as well as potential actions on the part of state and local governments, discussed more fully in Chapter 7 of *Growing Cooler*.

#### **Federal Actions**

Require Transportation Conformity for Greenhouse Gases. Federal climate change legislation should require regional transportation plans to pass a conformity test for CO<sub>2</sub> emissions, similar to those for other criteria pollutants. The Supreme Court ruling in Massachusetts v. EPA established the formal authority to consider greenhouse gases under the Clean Air Act, and a transportation planning conformity requirement would be an obvious way for the EPA to exercise this authority to produce tangible results.

Enact "Green-TEA" Transportation Legislation that Reduces GHGs. The Intermodal Surface Transportation Efficiency Act of 1991 (known as ISTEA) represented a revolutionary break from past highway bills with its greater emphasis on alternatives to the automobile, community involvement, environmental goals, and coordinated planning. The next surface transportation bill could bring yet another paradigm shift; it could further address environmental performance, climate protection, and green development. We refer to this opportunity as "Green-TEA."

Provide Funding Directly to Metropolitan Planning Organizations (MPOs). Metropolitan areas contain more than 80 percent of the nation's population and 85 percent of its economic output. Investment by state departments of transportation in metropolitan areas lags far behind these percentages. The issue is not just the amount of funding; it is also the authority to decide how the money is spent. What is necessary to remedy the long history of structural and institutional causes of these inequities is a new system of allocating federal transportation funds directly to metropolitan areas. The amount of allocation should be closer to the proportion of an MPO's population and economic activity compared to other MPOs and non-MPO areas in the same state.